

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA**

<b>WILLIAM RANDOLPH HALL, SR.,</b>	)	
<b>an individual, as Administrator of the</b>	)	
<b>Estate of WILLIAM RANDOLPH</b>	)	
<b>HALL, JR.</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>CIVIL ACTION NO.</b>
	)	<b>2:05-cv-0941-F</b>
	)	
<b>vs.</b>	)	<b>Pending transfer to MDL-1699</b>
	)	<b>(IN RE BEXTRA &amp; CELEBREX</b>
<b>PFIZER, INC., et al.</b>	)	<b>MARKETING, SALES</b>
	)	<b>PRACTICES &amp;</b>
<b>Defendants.</b>	)	<b>PRODS. LIAB. LITIG.)</b>
	)	

**MOTION FOR LEAVE TO REPLY TO PLAINTIFF'S  
OPPOSITION TO DEENDANT'S MOTIONTO STAY ALL PROCEEDINGS  
PENDING TRANSFER TO MULTI-DISTRICT LITIGATION PROCEEDING**

Defendants G.D. Searle LLC ("Searle"), Pharmacia Corporation ("Pharmacia" and also improperly captioned in Plaintiff's complaint as Monsanto Company) and Pfizer Inc. ("Pfizer") (the "Corporate Defendants") hereby respectfully move the Court to allow them the opportunity to Reply to Plaintiff's Opposition to Defendant's Motion to Stay All Proceedings Pending Transfer to Multi-District Litigation Proceeding. In support of said Motion, Corporate Defendants state as follows:

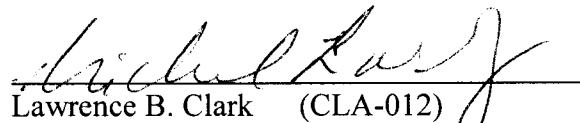
1. Corporate Defendants filed a Motion for a Stay of All Proceedings Pending Transfer to Multi-District Litigation Proceeding on October 21, 2005, arguing that the action should be stayed pending transfer to MDL-1699, to be presided over in the Northern District of California.

2. Plaintiff, on October 26, 2005, filed an Opposition to Defendant's Motion to Stay All Proceedings Pending Transfer to Multi-District Litigation Proceeding.

3. Corporate Defendants have reviewed Plaintiff's Opposition, and request the opportunity to file a brief Reply to that response. Corporate Defendants further request this Court to enter an Order allowing such a Reply and setting a filing deadline for the same.

Wherefore, premises considered, Corporate Defendants respectfully request that this Court enter an Order allowing them the opportunity to Reply to Plaintiff's Opposition to Defendant's Motion to Stay All Proceedings Pending Transfer to Multi-District Litigation Proceeding, and to notify the Parties when such Reply is due.

Respectfully submitted,



Lawrence B. Clark (CLA-012)  
Michael L. Wade, Jr. (WAD-020)  
Gilbert C. Steindorff, IV (STE-173)  
*Counsel for the Corporate Defendants*

OF COUNSEL:  
ADAMS & REESE / LANGE SIMPSON LLP  
2100 3rd Avenue North, Suite 1100  
Birmingham, AL 35203  
205.250.5000  
205.250.5034 (fax)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the 14th day of November, 2005, I caused the foregoing to be filed via the CM/ECF system, which will automatically provide electronic notice to the following counsel of record:

Navan Ward, Jr.  
Andy D. Birchfield, Jr.  
Paul Sizemore  
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.  
P.O. Box 4160  
Montgomery, AL 36103

Grady A. Reeves  
Cervera, Ralph & Butts  
P.O. Box 325  
Troy, Alabama 36081-0325

Larry Shane Seaborn  
Penn & Seaborn, LLC  
P.O. Box 688  
Clayton, Alabama 36016

Lynn W. Jinks, III  
Jinks Daniel & Crow LLC  
P.O. Box 350  
Union Springs, Alabama 36089-0350

  
OF COUNSEL